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BY ECF

JEFFREY LICHTMAN

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JASON GOLDMAN

Hon. Valerie Caproni United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: Grablis v. Onecoin Ltd., et al., 19-04074 (VEC)

Dear Judge Caproni:

I am writing on behalf of defendant Konstantin Ignatov to respectfully request a three week extension of time in which to file Mr. Ignatov's answer to the amended complaint or file any motions, which are presently due on July 16. This is Mr. Ignatov's second request for an extension of time, and it would permit Mr. Ignatov and plaintiffs to continue their progressing settlement negotiations, which in turn would obviate the need for Mr. Ignatov's responsive pleadings. Additionally, Mr. Ignatov is presently incarcerated, rendering attorney-client communications more difficult due to the ongoing public health crisis and slowing our efforts to resolve this case. I have conferred with counsel for Mr. Ignatov's co-defendants and plaintiffs, who have no objection. Should the Court grant this application, the revised briefing schedule as it applies to Mr. Ignatov would be as follows:

- Defendant Ignatov's answer to the amended complaint or any motions due by August 6, 2020;
- Plaintiff's response due by September 23, 2020; and
- Defendant's reply due by October 14, 2020.

Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

Jeffrey Inchtman

All counsel (by ECF)

cc: